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MD, DC, & VA

* criminal defense *debarment *security clearance cases and advice for individuals and companies

September 3, 2022

VIA ELECTRONIC MAIL

Terrance G. Reed Lankford & Reed, P.L.L.C. 120 N. St. Asaph Street Alexandria, VA 22314

Re: Lokhova v. Halper; 20-cv-1603; Discovery Production

Dear Mr. Reed:

Enclosed with this letter is the discovery production on behalf of the Plaintiff in this case per the Court's Order of yesterday, September 2, 2022, in response to Defendant's Amended Interrogatories and Amended Requests for Production of Documents.

- 1. Interrogatories: I have no Interrogatory Answers in my possession.
- 2. Requests for Production of Documents: I have some responsive documents in my possession; these are produced as enclosed, with a few minor redactions based on the attorney-client privilege and work product doctrine. I will produce a log for those purposes according to the Discovery Plan. The documents are Bates numbered LOK0001- LOK0814 and separated into smaller pdfs for transmission electronically.

Sincerely,

Leslie McAdoo Gordon

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Enclosures